

EXHIBIT B

In re: STANLEY A. RAMIREZ and ANN M. KENNEDY
CASE NO.: 10-34401 DM

Evans Law Office

Brette L. Evans, (SBN 177042)

255 N. Market Street, #110

San Jose, California 95110

Date 06/20/11

Invoice Stanley A. Ramirez and Ann Margaret Kennedy

Case No.: 10-34401 DM

CASE MANAGEMENT/ADMINISTRATION

9/3/2010 BLE	Met with client, discuss Skeleton Filing, Plan, Litigation In State Court, and Partnership Termination, Bankruptcy	2.00 \$300	\$ 600.00
10/25/2010 BLE	Review Doc's State Court Litig, Do Due Diligence Searches	0.80 \$300	\$ 240.00
10/25/10 BLE	Review Documents received from client, Create action Summary, Income Chart, Draft, Complete Schedule F, I, J 22c, Plan and Rights and Resp.	4.10 \$ 300.00	\$ 1,230.00
10/26/10 BLE	Review Bank Statements, Tax Returns for Business Schedules, do online appraisal Searches, finalize documents	1.90 \$ 300.00	\$ 570.00
11/1/10 BLE	Letter to client regarding missing documents, Other issues	0.40 \$ 300.00	\$ 120.00
11/2/10 BLE	Prepare for/Meeting with clients for signing	1.90 \$ 300.00	\$ 570.00
11/2/10 BLE	Final Review Before Filing	0.30 \$ 300.00	\$ 90.00
11/2/10 BLE	Review Correspondence from Client	0.20 \$ 300.00	\$ 60.00
11/5/10 BLE	Complete and Finalize Declarations for Employment, Rental Income, Self Employment	0.50 \$ 300.00	\$ 150.00

Income

12/13/10 BLE	Review Trustee Objection to Confirmation, Research Issues	0.30 \$ 300.00	\$ 90.00
12/23/10 BLE	Prepare for/attend Meeting of Creditors Hearing	1.00 \$ 300.00	\$ 300.00
12/23/10 BLE	Travel to/from Meeting of Creditors	\$ 2.00	
1/6/11 BLE	Review File re: Objections to Confirmation and action, documents needed to resolve	0.50 \$ 300.00	\$ 150.00
1/12/11 BLE	Review documentation provided by Debtors and Objections, Complete Amended Statement of Financial Affairs, Schedules A, D, E, F, I and J, Business J	2.30 \$ 300.00	\$ 690.00
1/21/11 BLE	Review Trustee Objection and Info Received Draft Amended Plan, 22c re: change in Circumstances, email to clients with Other Correspondence	2.10 \$ 300.00	\$ 630.00
2/4/11 BLE	Prepare for /Attend Continued MOC Hearing	1.10 \$ 300.00	\$ 330.00
2/10/11 BLE	Review Stipulation for Lien Strip, Sun Trust	0.50 \$ 300.00	\$ 150.00
2/10/11 BLE	Review new payment advices for new jobs, and change in self employment income, Review Order After Hearing for Change in Child Support	0.50 \$ 300.00	\$ 150.00
2/10/11 BLE	Draft Amended Schedules, I, J and E, and Amended Plan re: Changes in Circ.	1.60 \$ 300.00	\$ 480.00
2/14/11 BLE	Send clarifying email to Rosa Garcia, Trustee Analyst	0.30 \$ 300.00	\$ 90.00
2/15/11 BLE	Review Response received from Lilian Tsang	0.10 \$ 300.00	\$ 30.00

1/26/11 BLE	PCF Bankruptcy Clerk re: Amended Doc's Filed	0.10	\$	30.00
		\$ 300.00		
1/24/11 BLE	Correspondence to client re: needed documents, answered questions, other issues	0.40	\$	120.00
		\$ 300.00		
2/22/11 BLE	Send Correspondence to client re: Trustee Request for Business Exam, Review Change in Circ. Issues	0.20	\$	60.00
		\$ 300.00		
3/2/11 BLE	Draft Declaration re: Missing Bank Accounts	0.50	\$	150.00
		\$ 300.00		
3/10/11 BLE	Prepare for, Attend Meeting of Creditors	1.10	\$	330.00
		\$ 300.00		
3/29/11 BLE	Correspondence to Rosa Garcia re: Case Status and being removed from the TPL	0.10	\$	30.00
		\$ 300.00		
3/30/11 BLE	Review Corresp., Continued Objectionable issues cited by Rosa Garcia, as her statement that there are outstanding issues	0.20	\$	60.00
		\$ 300.00		
3/30/11 BLE	Draft detailed response to Rosa Garcia to outline how, all objectionable issues had been resolved	0.40	\$	120.00
		\$ 300.00		
6/10/2011 BLE	Correspondence to Rosa Garcia re: case status, moving case to confirmation, include pleadings filed by Kim Gage, attorney for Chrysler Financial	0.20	\$	60.00
		\$ 300.00		
6/16/11 BLE	Claims review prior to confirmation	0.20	\$	60.00
		\$ 300.00		

CHASE HOME FINANCE OBJECTION ISSUES

12/22/10 BLE	Review Objection filed by Chase Home Finance, Research Issues, Claims, Other doc's	0.30	\$	90.00
		\$ 300.00		
1/27/11 BLE	PCT Chase Home Finance, Discuss issues underlying Objection with Asst. to M. Cisneros	0.20	\$	60.00
		\$ 300.00		

1/27/11 BLE	Review Documents in Order to Draft Reply to Objection to Confirmation filed by Chase Home Finance	0.40 \$ 300.00	\$ 120.00
1/27/11 BLE	Draft Reply to the Objection Send to Client for Signature	1.10 \$ 300.00	\$ 330.00
2/23/11 BLE	PCT Malcolm & Cisneros re: Response to Reply to Objection, Proof Doc's show no default, discuss with mgr. of dept.	0.40 \$ 300.00	\$ 120.00
3/2/11 BLE	PCT Malcolm & Cisneros, failure to respond to Reply to Objection and Proof Documents Submitted, Objection filed in error	0.30 \$ 300.00	\$ 90.00
3/28/11 BLE	PCT Malcolm & Cisneros re: Failure to respond to Reply to Objection, Notice re: Request for Sanctions	0.30 \$ 300.00	\$ 90.00
3/29/11 BLE	Review Withdrawal of Documents, Obj. filed by Malcolm & Cisneros is withdrawn	0.10 \$ 300.00	\$ 30.00

MOTIONS TO VALUE COLLATERAL

1/10/11 BLE	Review Documents for Lien Strip Motions Do online searches for valuation and lien data	1.10 \$ 300.00	\$ 330.00
1/10/11 BLE	Draft Lien Strip for Sun Trust Second Mortgage, (Motion, Declaration and Notice)	2.60 \$ 300.00	\$ 780.00
1/20/11 BLE	Do Searches for Agent for Service of Process and other notice locations/entities for lien strip motion	0.80 \$ 300.00	\$ 240.00
1/21/11 BLE	Review Proof of Service, Lien Strip Notice, Motion and Declaration Before Filing	0.50 \$ 300.00	\$ 150.00
1/24/11 BLE	Research issues re: Motion to Avoid Lien of Bank of America, Texas Property	0.60 \$ 300.00	\$ 180.00
1/24/11 BLE	Draft Doc's for Motion to Avoid Lien (Notice, Motion, Declaration); Decl to client	3.80 \$ 300.00	\$ 1,140.00

1/27/11 BLE	Review Motion to Avoid Lien before Filing, Finalize Documents, Research Service issues for Motion	0.10	\$	30.00
		\$ 300.00		

2/28/11 BLE	Draft Request for Entry of Default and Order on Motion for Lien Strip, Bank of America	1.00	\$	300.00
		\$ 300.00		

MOTION FOR RELIEF FROM STAY

2/22/11 BLE	Review Motion for Relief from Stay	0.20	\$	60.00
		\$ 300.00		

2/23/11 BLE	Draft Statement of Non-opposition for R/S Motion	0.20	\$	60.00
		\$ 300.00		

CHRYSLER FINANCIAL SERVICES, OBJECTION TO CLAIM

3/10/11 BLE	Correspondence to/from client re: Chrysler Financial (Creditor) lawsuit and direct correspondence	0.20	\$	60.00
		\$ 300.00		

4/1/11 BLE	Research Pacer, Claims, and Los Angeles Country Pleading docket re: status of state court litigation and basis for 2,670,808.75 claim filed	0.50	\$	150.00
		\$ 300.00		

4/1/11 BLE	Research law on issues of unliquidated claim Read Guarantee Agreements, Case Law	3.80	\$	1,140.00
		\$ 300.00		

4/1/11 BLE	Draft Memorandum of Points & Authorities to Support Objection to Claim (2.1 million claim, wrongfully filed)	3.10	\$	930.00
		\$ 300.00		

4/1/11 BLE	Draft Declaration of Stanley Ramirez	0.80	\$	240.00
		\$ 300.00		

4/1/11 BLE	Draft Objection to Claim of Chrysler Financial	0.80	\$	240.00
		\$ 300.00		

4/1/11 BLE	Correspondence to Stan Ramirez Re: Decl. to Support Objection to Claim	0.10	\$	30.00
		\$	300.00	
4/4/11 BLE	Correspondence to/from Lilian Tsang re: Chrysler Financial Claim	0.10	\$	30.00
		\$	300.00	
4/29/11 BLE	Final Review of MPA, Objection to Claim, Changes to Declaration of Debtor	0.40	\$	120.00
		\$	300.00	
4/1/11 BLE	Review Correspondence from Rosa Garcia, re: problem claim (chrysler financial, claim 20) and informing that all Trustee Obj's are resolved	0.20	\$	60.00
		\$	300.00	
4/2/11 BLE	Correspondence to Rosa Garcia, reply to request for clarification re: status of claim, and other history	0.30	\$	90.00
		\$	300.00	
5/19/11 BLE	PCF Legal Asst. to Kim Gage, attorney for Chrysler Financial, discuss claim objection issues, Assent to withdraw claim	0.30	\$	90.00
		\$	300.00	

APPLICATION FOR ATTORNEYS' FEES

6/16/2011 BLE	Draft Application for Attorneys Fees, Declaration, other documents for hearing	2.50	\$	750.00
		\$	300.00	

Total Attorneys' Fees incurred to date: Attorney Hours: 52.90 **\$ 15,870.00**

COSTS EXPENDED ON CLIENT'S BEHALF

West law Research, one time use fee, \$100.00	\$100.00
Postage for Plan Service (.42 * 60)	\$25.20
Photo copy charges (382 * .20)	\$76.40
Amended Schedules/Court Fees (3 amendments)	<u>\$78.00</u>
	\$279.60

Total Costs Expended: **\$279.60**

Total Fees and Costs Incurred to Date: **16,149.60**

Funds Held in Trust, Paid Pre-Petition: **(\$1,500.00)**

Remaining Outstanding Fees: **\$14,649.60**